# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

SHENNACO HOLDINGS, LLC,	§	
Plaintiff,	§ 8	
- m,	<b>§</b>	
<b>v.</b>	§	CIVIL ACTION NO. 4:18-cv-00072-O
	8	
MITCHELL CHAD BARRETT	§	
	§	
Defendant.	§.	

## **PLAINTIFF'S WITNESS LIST**

COMES NOW Plaintiff ShennaCo holdings, LLC ("Plaintiff" or "ShennaCo") and submits its Witness List. At this time, Plaintiff identifies the following witnesses for trial:

### I. PROBABLE WITNESSES

Witness	Subject Matter	Sworn	Testified
David Alan Meeker c/o Perkins Coie, LLP Mark L. Johansen Steve Smith 500 N. Akard Street Suite 3300 Dallas, TX 75201	Mr. Meeker is the manager of ShennaCo, the plaintiff in the instant case. Mr. Meeker is expected to testify regarding the contract which forms the basis of Plaintiffs' claims in this suit, including the basis for its execution, the circumstances surrounding its execution, the intent of the parties as to certain provisions of the contract, and the parties' performance under the same. Mr. Meeker is also expected to testify concerning damages suffered by ShennaCo as a result of Defendant's conduct.  Mr. Meeker, as manager of ShennaCo, has been deposed.  Mr. Meeker's testimony is expected to last 2-3 hours.		

Mitchell Chad Barrett c/o Barnes & Thornburg LLP Robert M. Castle, III Jamie R. Welton Lucas C. Wohlford 2121 North Pearl Street Suite 700 Dallas, TX 75201	Mr. Barrett is the defendant in the present case. Mr. Barrett is expected to testify concerning the contract which forms the basis of Plaintiff's claims in this case, including the basis for its formation, the circumstances surrounding its execution, and the parties' performance under the same.	
Dob out Durch ou	Mr. Barrett has been deposed.  Mr. Barrett's testimony is expected to last 1 hour.	
Robert Durham 1372 E. Northside Drive Jackson, MS 39211	Mr. Durham is expected to testify concerning the relationship of the parties during the 2014-2016 timeframe, including the facts and circumstances that led to the execution of the contract which forms the basis of Plaintiff's claims in this case.  Mr. Durham has not been deposed.	
	Mr. Durham's testimony is expected to last 1 hour.	

# II. POSSIBLE WITNESSES

Witness	Subject Matter	Sworn	Testified
Joe Story, M.D. 714 Peakes Point Drive Gulf Breeze, FL 32561	Dr. Story is expected to testify concerning the relationship of the parties during the 2014-2016 timeframe, including the facts and circumstances that led to the execution of the contract which forms the basis of Plaintiff's claims in this case.  Dr. Story has not been deposed.  Dr. Story's testimony is expected to last 1 hour.		

Husni Charara, M.D. 8851 Boardroom Circle Fort Meyers, FL 33919	Dr. Charara is expected to testify concerning the relationship of the parties during the 2014-2016 timeframe, including the facts and circumstances that led to the execution of the contract which forms the basis of Plaintiff's claims in this case.  Dr. Charara has not been deposed.  Dr. Charara's testimony is expected to last 1 hour.	
Mark Prewitt 914 Grove Street Vicksburg, MS 39183	Mr. Prewitt is expected to testify concerning the negotiations and execution of the contract which forms the basis for Plaintiff's claims in this case.  Mr. Prewitt has not been deposed.  Mr. Prewitt's testimony is expected to last 1 hour.	

# III. EXPERTS

Witness	Subject Matter	Sworn	Testified
Mark L. Johansen Perkins Coie, LLP 500 N. Akard Street Suite 3300 Dallas, TX 75201	In the event the Court requests testimony regarding attorneys' fees at this stage, Mr. Johansen will testify as to the reasonable and necessary attorneys' fees and costs incurred by Plaintiff in this case.		
	Mr. Johansen has not been deposed.		
	Mr. Johansen's testimony is expected to last 1 hour.		

#### IV. RECORD CUSTODIANS

At this time, Plaintiff does not intend to call any record custodians as a witness, except that the witnesses already identified above may be deemed record custodians of certain exhibits to be offered at trial.

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served via email on all counsel of record on February 8, 2019.

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